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October 22, 2019

By ECF  
Hon. Paul A. Crotty  
Judge, United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Hon. Judge Crotty,

We write to request the Court's intervention and seek the Court's assistance in getting Mr. Schulte a third day in the Secret Compartmentalized Information Facility (SCIF). Currently Mr. Schulte visits the SCIF twice a week from about 10:00 a.m. to 2:30 p.m.

Unfortunately, given the volume of discovery, the classified nature of the motion practice, and the upcoming due dates, bringing Mr. Schulte to the SCIF twice a week is simply not sufficient for him to review the classified filings, in addition to discussing with counsel a specific response. We are overwhelmed with the amount of classified material in this case and given the CIA's refusal to engage in a proper classification review, we have no option but to request an additional SCIF day.

Thank you for your time and consideration of this request.

Respectfully submitted,

/s/

Glashausser/Shroff / Zas  
Assistant Federal Defenders